

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JANE DOE 1, *et al.*,

Plaintiffs,

v.

BAYLOR UNIVERSITY,

Defendant.

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Civil Action No. 6:16-CV-00173-RP

**JOINT NOTICE RE AGREEMENT TO LIMIT VOLUMINOUS DOCUMENTS FROM
PRODUCTION PURSUANT TO COURT ORDER (DKT. 596)**

TO THE JUDGE OF THE HONORABLE COURT:

On March 5, 2019, the Court issued its Order (Dkt. 596) on Baylor's Thirteenth Unopposed Ex Parte Motion to File Student Records for In Camera Inspection (the "Motion") (Mot., Dkt. 435; Am. Mot., Dkts. 454-467). Therein, the Court noted a significant volume of scholarship records and travel logistics that, while technically responsive, were of little or no relevance to Plaintiffs' claims and would constitute a significant burden for Baylor to redact and produce. (Dkt. 596 at 4-5). The Court therefore suggested the parties consider an agreement similar to the one it entered into regarding the production of records related to Alleged Assailant 1 (Dkt. 587), under which Baylor would omit from production the documents identified in the Order, with the following exception: Baylor will produce only pages within those documents in which the name of any alleged assailant or any objecting non-party student appears with those names pseudonym-redacted, and all information relating to any other student block-redacted without pseudonyms. This agreement is without prejudice to Plaintiffs' ability to seek further information after reviewing this production of documents.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion was served upon all counsel of record via the Court's electronic service system on March 11, 2019:

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